REMARKS

Applicants have amended claims 21, 37, and 45 and claims 1-20 and 35 were previously cancelled. Therefore, twenty-six (26) claims remain pending: claims 21-34 and 36-47. Applicants respectfully request reconsideration of claims 21-34 and 36-47 in view of the amendments above and remarks below.

By way of this amendment, Applicants have made a diligent effort to place the claims in condition for allowance. However, should there remain any outstanding issues that require adverse action, it is respectfully requested that the Examiner telephone the undersigned at (858) 552-1311 so that such issues may be resolved as expeditiously as possible.

Claim Rejections - 35 U.S.C. § 103

1. Claims 21-23, 26-28 and 45-46 stand rejected under 35 U.S.C. §103(a), as being unpatentable over U.S. Patent No. 6,184,877 (Dodson et al.) in view of U.S. Patent No. 6,865,746 (Herrington et al.). This rejection is respectfully traversed and reconsideration is requested.

To establish *prima facie* obviousness of a claimed invention, all the claim elements must be taught or suggested by the prior art. See M.P.E.P. § 2143.03.

As presently amended, claim 21 recites, among other elements: "...receiving a keyword and a first code associated with the video image over a second communication channel, wherein the first code is preassociated with preselected information relating to the keyword prior to receiving the keyword...."

The present Office Action suggests that Dodson et al. teaches that "the automatic search terms are used to perform a search that returns results, the search results associated with the first code, wherein the results are inherently information that is predefined since it would be impossible for the search to pull up such information if the information was not already defined." (see paragraph 4, page 4 of present Office Action). Claim 21 has been amended, however, to recite wherein the first code is "preassociated with preselected information." Thus, information preassociated with the first code is preselected in advance of any search of the network for

information related to the claimed keyword. The results of the keyword search of Dodson et al. are not preselected because they may vary from search to search. Herrington et al. does not provide any teaching or suggestion that, taken with Dodson et al., renders claim 21 obvious. For at least these reasons, neither Dodson et al. nor Herrington et al. teach at least the aforementioned elements as presently recited in claim 21. Accordingly, Applicants respectfully submit that claim 21 and claims 22-23 and 26-28, which depend from claim 21, are not rendered *prima facie* obvious in light of the combined references.

As presently amended, claim 45 recites elements similar to those found in claim 21. Accordingly, arguments presented above with respect to the rejection of claim 21 are also applicable to the rejection of claim 45. For at least these reasons, neither Dodson et al. nor Herrington et al. teach at least the aforementioned elements as presently recited in claim 45. Accordingly, Applicants respectfully submit that claim 45 and claim 46, which depends from claim 45, are not rendered *prima facie* obvious in light of the combined references.

2. Claims 24, 29-30, 37, 39-41 and 43-44 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,184,877 (Dodson et al.) in view of U.S. Patent No. 6,865,746 (Herrington et al) in further view of U.S. Patent No. 6,499,057 (Portuesi). This rejection is respectfully traversed and reconsideration is requested.

Claims 24 and 29-30 depend from claim 21. As demonstrated above, the combination of Dodson et al. and Herrington et al. fails to teach or suggest each element of claim 21. Portuesi does not provide any teaching or suggestion that, taken with the combination of Dodson et al. and Herrington et al., renders claim 21 obvious. Therefore, a *prima facie* case of obviousness is not met with regard to at least dependent claims 24 and 29-30.

As presently amended, claim 37 recites elements similar to those found in claims 21 and 45. Accordingly, arguments presented above with respect to the rejection of claims 21 and 45 are also applicable to the rejection of claim 37. For at least these reasons, the combination of Dodson et al., Herrington et al., and Portuesi fails to teach or suggest at least the aforementioned elements as presently recited in claim 37. Accordingly, Applicants respectfully

submit that claim 37 and and claims 39-41, 43, and 44, which depends from claim 37, are not rendered *prima facie* obvious in light of the combined references.

3. Claim 25 stands rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,184,877 (Dodson et al.) in view of U.S. Patent No. 6,865,746 (Herrington et al) in further view of U.S. Patent No. 5,819,284 (Farber et al.). This rejection is respectfully traversed and reconsideration is requested.

Claim 25 depends from claim 21. As demonstrated above, the combination of Dodson et al. and Herrington et al. fails to teach or suggest each element of claim 21. Farber et al. does not provide any teaching or suggestion that, taken with the combination of Dodson et al. and Herrington et al., renders claim 21 obvious. Therefore, a *prima facie* case of obviousness is not met with regard to at least dependent claim 25.

4. Claim 42 stands rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,184,877 (Dodson et al.) in view of U.S. Patent No. 6,865,746 (Herrington et al) in further view of U.S. Patent No. 5,819,284 (Farber et al.) and U.S. Patent No. 6,499,057 (Portuesi). This rejection is respectfully traversed and reconsideration is requested.

Claim 42 ultimately depends from claim 37. As demonstrated above, the combination of Dodson et al., Herrington et al., and Portuesi fails to teach or suggest each element of claim 37. Farber et al. does not provide any teaching or suggestion that, taken with the combination of Dodson et al., Herrington et al., and Portuesi, renders claim 37 obvious. Therefore, a *prima facie* case of obviousness is not met with regard to at least dependent claim 42.

5. Claims 31-34 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,184,877 (Dodson et al.) in view of U.S. Patent App. Pub. No. 2004/0040042 (Feinleib) in further view of U.S. Patent No. 6,615,408 (Kaiser et al.) and

U.S. Patent No. 6,499,057 (Portuesi). This rejection is respectfully traversed and reconsideration is requested.

As mentioned above, a *prima facie* case of obviousness is only established when, among other things, all elements of a claim are taught or suggested by the prior art. See M.P.E.P. § 2143.03.

The present Office Action suggests that Kaiser et al. teaches the claimed "unique identifier of the [local] storage medium." Applicants respectfully disagree.

Kaiser et al. describes the provision of a Universal Resource Identifier ("URI") as relied upon in the Office Action. The "<server name>" portion of the URI, which the Examiner equates to a "unique storage identifier," at best describes a remote storage medium rather than a local storage medium, as claim 31 recites. Further, a title is not a unique identify of the medium as the title simply refers to the content stored on the medium, and is generic to multiple distinct medium each have different unique identifers. Therefore, Kaiser et al. does not teach the "unique identifier of the storage medium ..." as recited in claim 31.

For at least these reasons, the combination of Dodson et al., Feinleib, Kaiser et al. and Portuesi fails to teach or suggest at least the aforementioned elements as recited in claim 31. Accordingly, Applicants respectfully submit that claim 31 and claims 32-34, which depend from claim 31, are not rendered *prima facie* obvious in light of the combined references.

The amendments to claim 31 do not introduce new matter and do not necessitate new grounds for rejection as the Examiner has already searched for prior art containing the claimed "receiving keywords comprising a unique identifier of the storage medium". Therefore, the amendment to claim 31 does not necessitate further searching.

6. Claim 36 stands rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,184,877 (Dodson et al.) in view of U.S. Patent Application No. 2004/0040042 (Feinleib) in further view of U.S. Patent No. 6,615,408 (Kaiser et al.), U.S. Patent No. 6,499,057 (Portuesi), and U.S. Patent No. 5,819,284 (Farber et al).

Claim 36 depends from claim 31. As demonstrated above, the combination of Dodson et al., Feinleib, Kaiser et al., and Portuesi fails to teach or suggest each element of claim 31. Farber et al. also fails to teach or suggest at least "receiving keywords comprising a unique identifier of the storage medium..." as recited in claim 31. Therefore, the combination of Dodson et al., Feinleib, Kaiser et al., Portuesi, and Farber et al. does not render claim 31 obvious; thus, a *prima facie* case of obviousness is not met with regard to dependent claim 36.

7. Claim 47 stands rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,184,877 (Dodson et al.) in view of U.S. Patent No. 6,865,746 (Herrington et al) and further in view of U.S. Patent App. Pub. No. 2001/0005903 (Goldschmidt Iki et al.).

Claim 47 depends from claim 45. As demonstrated above, the combination of Dodson et al. and Herrington et al. fails to teach or suggest each element of claim 47. Goldschmidt Iki et al. does not provide any teaching or suggestion at least of a first code being "preassociated with preselected information..." as recited in claim 45. As such, the combination of Dodson et al., Herrington et al., and Goldschmidt Iki et al. fails to render claim 47 obvious. Therefore, a *prima facie* case of obviousness is not met with regard to at least dependent claim 47.

CONCLUSION

Applicants submit that the above amendments and remarks place the pending claims in a condition for allowance. Therefore, a Notice of Allowance is respectfully requested.

Respectfully submitted,

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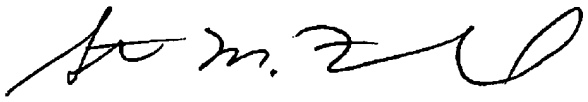

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